

REMARKS

Claims 46-80 and 82-100 were pending in the application at the time the present Office Action was mailed. Claim 82 has been amended by the present response to restore a portion of the text that was inadvertently deleted in the previous amendment. No claims have been cancelled or added by the present response. Accordingly, claims 46-80 and 82-100 remain pending in the application.

INFORMATION DISCLOSURE STATEMENT

In the present Office Action, the Examiner noted several deficiencies in the Information Disclosure Statement (IDS) filed on November 8, 2004. Specifically, the Examiner indicated that the references he lined through on the prior IDS either (1) could not be found in the identified parent applications, (2) were foreign publications that were not in the English language, and/or (3) failed to include publication dates.

To resolve these deficiencies, the applicant has filed a Third Supplemental IDS with the present response. In regard to the first noted deficiency, the Third Supplemental IDS includes copies of all but one of the previously-cited references that could not be found by the Examiner in the parent applications. The one missing reference, "CDS Automated receipt giving cash deposit system," is noted on the Third Supplemental IDS and could not be found by the applicant after diligent search. The applicant notes, however, that this particular reference was previously cited by the applicant in the following applications and patents, and was initialed by the respective Examiners in each of these cases: 08/689,826; 09/035,273; 5,799,767; 6,047,807; 6,484,863; 6,494,776; 6,736,251; 6,758,316; and 6,854,581. Therefore, the applicant respectfully requests that the Examiner refer to the prosecution file of one or more of these previous applications/patents to obtain a copy of the missing reference.

In regard to the second noted deficiency, no English language abstract is readily available for six of the cited references as noted on the Third Supplemental IDS. Each of these foreign language references, however, was previously reviewed and initialed by the respective Examiners in the prior related cases listed above, suggesting that the figures alone provide a sufficient basis for determining the relevance of the references.

If the Examiner requires more, however, the applicant will have all or a portion of the identified reference or references translated.

In regard to the third noted deficiency, six of the references cited on the Third Supplemental IDS lack publication dates. The applicant was unable to determine the dates of these references after a reasonable investigation. The applicant assumes that the dates of these references are prior to the priority date of the present application, and would like the Examiner to assume this date for the purpose of considering the references and advancing prosecution. However, the applicant reserves the right to confirm the actual date of these references in the event the Examiner determines one or more of these references are material to one or more claims in the present application.

CLAIM OBJECTIONS

Claims 82 and 83 were objected to in the Office Action because claim 83 commenced on the last line of claim 82. This typographical informality has been corrected, and claim 83 now commences on a separate line. Accordingly, the objection to claims 82 and 83 should be withdrawn.

CLAIM REJECTIONS

Claims 46-80 and 82-100 were rejected in the present Office Action. More specifically, the status of the claims in light of the present Office Action is as follows:

(A) Claims 46-76 and 85-100 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Technical Referens [sic] Manual for the Scan Coin CDS Coin Deposit System (odd pages only), dated 1989 (the "Scan Coin Manual") in view of U.S. Patent No. 4,412,292 to Sedam et al. ("Sedam"); and

(B) Claims 77-80 and 82-84 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Scan Coin Manual in view of Sedam, and further in view of U.S. Patent No. 3,998,237 to Kressin et al. ("Kressin").

The undersigned attorney wishes to thank the Examiner for engaging in a telephone conference on May 13, 2005 to discuss the present Office Action. During the course of the telephone conference, the undersigned attorney and the Examiner

discussed various aspects of the pending claims and the applied references. The following remarks expand on the points raised during the May 13 telephone conference. If the Examiner believes any additional information regarding the telephone conference is necessary, please let the undersigned attorney know.

A. Response to the Section 103 Rejection of Claims 46-76 and 85-100

Claims 46-76 and 85-100 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Scan Coin Manual in view of Sedam. A proper *prima facie* case of obviousness requires (1) that the applied references teach or suggest *all* the claim features, and (2) that the applied references – not the applicant's disclosure – provide the suggestion or motivation to combine reference teachings. (MPEP 2143). In the present case, the applied references fail on both these counts. First, neither the Scan Coin Manual nor Sedam, either alone or in combination, teaches or suggests all the claim features. Second, even if these references did teach all the claim features, there is still no motivation *in the prior art* to combine these references to produce the claimed invention. Therefore, as set forth in greater detail below, the rejection of claims 46-76 and 85-100 should be withdrawn.¹

1. Independent Claims 46, 63, 73, 89 and 99 Are Directed to Coin Counting Apparatuses That Include, *Inter Alia*, a User Interface Configured to Receive a Request For a Redeemable Voucher, and a Communications Facility Configured to Transmit Certain Information to a Remote Computer

Independent claims 46, 63, 73, 89 and 99 are directed to coin counting apparatuses that include, *inter alia*, a user interface configured to receive a request for a redeemable voucher. As the present application explains, in one embodiment, the redeemable voucher is redeemable for cash or credit towards purchases at the supermarket or other retail location where the coin counting apparatus is installed. (Application at page 18, lines 11-12; page 31, lines 36-37; and page 33, lines 3-5).

¹ Silence regarding a position taken by or argument made by the Examiner does not indicate any acquiescence to that position or argument. Furthermore, arguments made with respect to a particular claim or claims apply only to that claim or claims, and not to other claims, unless specifically noted herein.

The coin counting apparatuses of claims 46, 63, 73, 89 and 99 further include a communications facility configured to transmit information to a remote computer. In claim 46, for example, the communications facility is configured to transmit information related to a status of a coin receptacle. In claim 63, the communications facility is configured to transmit information related to a malfunction of the coin counting apparatus. In claim 73, the communications facility is configured to transmit information related to the redeemable voucher. In claim 89, the communications facility is configured to transmit information related to any one of status of a coin receptacle, operating status of the coin counting apparatus, verification of a voucher, and an amount of acceptable coins counted.

2. The Scan Coin Manual Describes a Coin Counting Machine For Use in a Bank To Facilitate the Deposit of Coins in Customer Accounts

The Scan Coin Manual discloses a coin counting machine for use in the lobby of a bank, credit union, or similar institution to facilitate the deposit of coins in customer accounts. As the title of this manual states, it is a reference manual for a Coin "Deposit" System (hence the acronym, "CDS"). The Introduction to the Scan Coin Manual further explains:

"This is the lobby version of the Scan Coin 'Cash Deposit System' range. It offers institutions such as Banks, Savings & Loans, Credit unions and other businesses, the advantage of a customer operated coin deposit unit with receipt printing."

(Scan Coin Manual at page 5).

The General Description section of the Scan Coin Manual goes on to explain that the receipt generated by the Coin Deposit System is used by the customer to deposit the value of their coins in an account:

"The machine can be installed in the lobby of a bank for accepting mixed coins and producing a high security receipt. The receipt can then be deposited together with notes and checks."

(Scan Coin Manual at page 9).

As explained below, the "security receipt" of the Scan Coin system is significantly different and more limiting than the claimed "redeemable voucher."

3. Sedam Discloses a System For Monitoring a Plurality of Remote Vending Machines

As Figure 1 of Sedam illustrates, this reference discloses a system for transmitting information from multiple remote vending machines A, B, and C to a central computer complex CC. Each vending machine can include a microprocessor module attached to a number of sensors within the machine. The sensors can include vend relays, credit relays, selector buttons, sold-out indicators, temperature sensors, compressors, and a vending-machine-door-actuated switch. In operation, the microprocessor in each of the vending machines monitors the sensors and, at predetermined intervals, accesses a telephone line connected to the vending machine to call the central computer complex. Once communication is established, the microprocessor identifies itself and transmits information to the central computer complex. (Sedam at column 2, lines 16-53).

4. The Scan Coin Manual and Sedam Cannot Support a Section 103 Rejection of Independent Claim 46 for at Least the Reason That These References Fail to Teach or Suggest (1) a Redeemable Voucher, and (2) a Communications Facility Configured to Transmit Information About a Coin Receiptacle to a Remote Computer

The coin counting apparatus of independent claim 46 includes a user interface configured to receive a request for a redeemable voucher. Neither the Scan Coin Manual nor Sedam teach or suggest this feature. To overcome this shortfall, the Office Action suggests that the Scan Coin deposit receipt can be expanded to read on the redeemable voucher of claim 46. The deposit receipt, however, is clearly used for proof of coin *deposit* — not for coin *redemption*. For example, on page 9, the Scan Coin Manual expressly states that the Scan Coin CDS is a "coin *deposit* unit" that can be installed in the lobby of a bank for accepting coins and producing a "high security *receipt*" that can be "*deposited* together with notes and checks."

As these passages make clear, the Scan Coin deposit receipt is nothing more than a conventional receipt — *not a redeemable voucher*. A receipt is "a written

acknowledgement that a given article, sum of money, or shipment has been received." (The American Heritage College Dictionary, 3rd Edition). The Scan Coin deposit receipt fits this definition. Specifically, the bank takes the receipt as sufficiently reliable proof of the deposit to give the customer credit for the deposit. The Scan Coin receipt, however, is not a "redeemable voucher" as used in the claims because redeem means "to turn in and receive something in exchange." (*Id.*)

Only the present application provides a teaching of the claimed system that provides a redeemable voucher. Any modification to the Scan Coin Coin Deposit System to provide a redeemable voucher would only be apparent to one skilled in the art after reading the present application and applying impermissible hindsight analysis. Accordingly, the Scan Coin Manual and Sedam cannot support a proper Section 103 rejection independent claim 46 for at least the reason that these references fail to teach or suggest a redeemable voucher. Therefore, the rejection of claim 46 should be withdrawn.

The coin counting apparatus of claim 46 further includes a communications facility configured to transmit information to a remote computer. Although the Scan Coin Manual does identify a modem that can be connected to a main circuit board in the Coin Deposit System, merely citing the existence of a modem cannot reasonably be construed as teaching *the particular information* the modem conveys. For example, the communications facility of claim 46 is configured to transmit information related to a status of a coin receptacle that receives acceptable coins from a coin discriminator. The Office Action correctly notes that the Scan Coin Manual fails to teach or suggest this feature. To cure this deficiency, however, the Office Action suggests that Sedam provides the missing feature.

The remote monitoring system of Sedam, however, is not concerned with monitoring a coin receptacle that receives acceptable coins from a coin discriminator. To the contrary, Sedam explicitly states that his system is concerned with monitoring "inventory, product demand, and certain alarm conditions," and none of the "certain alarm conditions" are associated with the status of a coin receptacle that receives acceptable coins from a coin discriminator. (Sedam at column 1, lines 11-17; and at

columns 2 and 3, lines 67-23). To read this feature into Sedam's disclosure is to ignore the requirement that the applied references standing alone, without hindsight of the applicant's disclosure, must teach or suggest all the claim features. Accordingly, the Scan Coin Manual and Sedam cannot support a proper Section 103 rejection of independent claim 46 for the additional reason that these references fail to teach or suggest a communications facility configured to transmit information related to a status of a coin receptacle. Therefore, the rejection of claim 46 should be withdrawn.

The rejection of claim 46 should be withdrawn for at least one additional reason. Specifically, there is no motivation – *in the prior art* – to combine the remote vending machine monitoring system of Sedam with the bank lobby Coin Deposit System taught by the Scan Coin Manual. More to the point, the primary objective of Sedam is to monitor a *plurality* of vending machines situated at *remote* locations. (Sedam at column 1, lines 46-49). In contrast, the Scan Coin Deposit System is situated in a bank to facilitate the deposit of coins at *that bank*. Sedam would not have suggested using his "central computer complex" to monitor a single vending machine located in the same building as the computer complex. To somehow suggest that a motivation existed for combining Sedam with the Scan Coin Manual is to create a need where one did not exist. Indeed, it was not until the applicant distributed coin counting apparatuses in supermarkets and other retail locations across the country that the need for networking of those coin counting apparatuses was identified. Accordingly, the combined references of the Scan Coin Manual and Sedam cannot support a proper Section 103 rejection of independent claim 46 for at least the additional reason that there is no motivation to combine these references. Therefore, the rejection of claim 46 should be withdrawn.

Claims 47-57 depend from base claim 46. Accordingly, the applied references of the Scan Coin Manual and Sedam cannot support a Section 103 rejection of dependent claims 47-57 for at least the reason that these references cannot support a Section 103 rejection of corresponding base claim 46, and for the additional features of these dependent claims. Therefore, the rejection of dependent claims 47-57 should be withdrawn.

The Section 103 rejection of dependent claims 47 and 48 should be withdrawn for at least one additional reason. Each of these claims recites that the communication facility of claim 46 is configured to transmit a signal to the remote computer when the coin receptacle is at least generally full of acceptable coins. Nowhere does the Scan Coin Manual or Sedam teach or suggest this feature. More to the point, nowhere *has the Office Action identified where* the applied references teach this particular feature. Furthermore, dependent claim 48 goes on to state that "the signal causes a person to empty the coin receptacle." Again, nowhere do the applied references teach or suggest this feature. Therefore, the rejection of dependent claims 47 and 48 should be withdrawn for at least these additional reasons.

Should the Examiner wish to maintain the rejections of dependent claims 47 and 48, the applicant respectfully requests that the Examiner identify *where* the applied references teach these features. Absent this clarification, the applicant has not been given a fair opportunity to respond to a properly framed *prima facie* rejection under Section 103 and, accordingly, the rejection should be withdrawn.

5. The Scan Coin Manual and Sedam Cannot Support a Section 103 Rejection of Independent Claim 63 for at Least the Reason That These References Fail to Teach or Suggest (1) a Redeemable Voucher, and (2) a Communications Facility Configured to Transmit Information to a Remote Computer In the Event of a Malfunction

Independent claim 63 is directed to a coin counting apparatus that includes, *inter alia*, a user interface configured to receive a request for a redeemable voucher. For the reasons set forth above in regard to claim 46, neither of the applied references teaches nor suggests the redeemable voucher of claim 63. Accordingly, the rejection of claim 63 should be withdrawn for at least this reason.

The coin counting apparatus of claim 63 further includes a communication facility configured to transmit information to a central computer in the event of a malfunction of at least a portion of the coin counting apparatus. Nowhere does the Scan Coin Manual or Sedam teach or suggest this particular feature. Furthermore, there is no motivation to modify the Scan Coin Coin Deposit System to include this feature. Indeed, if a bank had a malfunctioning coin counting machine in their lobby, they would not need

Sedam's "central computer complex" to inform them of this fact. Rather, a customer would bring the malfunction to their attention almost immediately. Thus, there is no motivation to combine Sedam with the Scan Coin system and, accordingly, the rejection of independent claim 63 should be withdrawn for at least this additional reason.

Claims 64-68 depend from base claim 63. Accordingly, the applied references cannot support a Section 103 rejection of dependent claim 64-68 for at least the reason that these references cannot support a Section 103 rejection of base claim 63, and for the additional features of these dependent claims. For example, dependent claim 66 recites that the coin counting apparatus of claim 63 transmits a signal related to the status of printer paper. Nowhere do any of the applied references teach or suggest this particular feature. Therefore, the rejection of dependent claims 64-68 should be withdrawn.

6. The Scan Coin Manual and Sedam cannot support a Section 103 Rejection of Independent Claim 73 for at Least the Reason That These References Fail to Teach or Suggest (1) a Redeemable Voucher, and (2) a Communications Facility Configured to Transmit Information Related to the Redeemable Voucher

Independent claim 73 is directed to a coin counting apparatus that includes, *inter alia*, a user interface configured to receive a request for a redeemable voucher. For the reasons set forth above in regard to claim 46, neither of the applied references teaches nor suggests the redeemable voucher of claim 73. Accordingly, the rejection of claim 73 should be withdrawn for at least this reason.

The coin counting apparatus of claim 73 further includes a communication facility configured to transmit information related to the redeemable voucher to a central computer. Nowhere does the Scan Coin Manual or Sedam teach or suggest this particular feature. Accordingly, should the Examiner wish to maintain this rejection, the applicant respectfully requests that the Examiner identify *where* the applied references teach a communication facility that transmits information related to a redeemable voucher from a coin counting apparatus to a central computer. Absent this teaching, the applied references cannot support a proper Section 103 rejection of independent claim 73 and the rejection should be withdrawn.

Claims 74-76 depend from base claim 73. Accordingly, the applied references cannot support a Section 103 rejection of dependent claims 74-76 for at least the reason that these references cannot support a Section 103 rejection of base claim 73, and for the additional features of these dependent claims. Therefore, the rejection of dependent claims 74-76 should be withdrawn.

The rejection of dependent claim 74 should be withdrawn for at least one additional reason. Claim 74 recites that the communications facility of claim 73 is configured to transmit information "usable to verify the authenticity of the redeemable voucher." Nowhere do either of the applied references teach or suggest this feature. More to the point, nowhere does the Office Action identify how the applied references have been construed to include this particular feature. Accordingly, claim 74 should be withdrawn for at least this additional reason.

The rejection of dependent claim 76 should be withdrawn for at least one additional reason. Dependent claim 76 recites that the voucher dispenser of base claim 73 is configured to dispense a voucher "that is redeemable at a point of sale in a non-bank retail location in exchange for products sold at the retail location." Again, nowhere do either of the applied references teach or suggest this feature. Specifically, nowhere does the Scan Coin Manual suggest deploying its Coin Deposit System in a non-bank retail location. Further, nowhere does this reference teach or suggest exchanging its coin deposit receipt for "products sold at a retail location." Therefore, the rejection of dependent claim 76 should be withdrawn for at least this additional reason.

7. The Scan Coin Manual and Sedam Cannot Support a Section 103 Rejection of Independent Claim 89 for at Least the Reason That These References Fail to Teach or Suggest (1) a Redeemable Voucher, and (2) a Communications Facility Configured to Transmit Information Related to the Coin Counting Apparatus to a Remote Computer

Independent claim 89 is directed to a coin counting apparatus that includes, *inter alia*, a user interface configured to receive a request for a redeemable voucher, and a communications facility configured to transmit information to a remote computer. For the reasons set forth above in regard to claim 46, neither of the applied references

teaches nor suggests these features. Accordingly, the rejection of claim 89 should be withdrawn for at least this reason.

Claims 90-98 depend from base claim 89. Accordingly, the applied references cannot support a Section 103 rejection of dependent claims 90-98 for at least the reason that these references cannot support a Section 103 rejection of base claim 89, and for the additional features of these dependent claims. Therefore, the rejection of dependent claims 90-98 should be withdrawn.

The rejection of dependent claims 91-94 should be withdrawn for at least one additional reason. Dependent claim 91 recites that the communications facility of base claim 89 is further configured "to receive information from an external source." Nowhere do either of the applied references teach or suggest this particular feature. Accordingly, the rejection of dependent claim 91 should be withdrawn for at least this additional reason.

Claims 92-94 depend from dependent claim 91. Dependent claim 92, for example, recites that the information the coin counting apparatus receives from the external source includes at least one of promotional information, coupon information, audio displays, and video displays. Dependent claim 93 recites that the information received from the external source includes at least one of modifications and upgrades to computer readable media controlling operation of the coin counting apparatus. Dependent claim 94 recites that the information received from the external source includes computer readable instructions for controlling operation of the coin counting apparatus. As set forth above, nowhere do the applied references teach or suggest the particular features of dependent claims 92-94 and, furthermore, nowhere does the Office Action identify where the applied references teach these features. Accordingly, the rejection of dependent claims 92-94 should be withdrawn for at least this additional reason.

The rejection of dependent claim 97 should be withdrawn for at least one additional reason. Dependent claim 97 recites that the user interface of claim 89 is further configured to receive voice recognition input from a user. In addition, claim 97 further recites that the communications facility of claim 89 is further configured to

transmit information relating to the voice recognition input to the remote computer. Nowhere do either of the applied references teach or suggest a user interface "configured to receive voice recognition input from a user." Accordingly, the rejection of dependent claim 97 should be withdrawn for at least this additional reason.

The rejection of dependent claim 98 should be withdrawn for at least one additional reason. Dependent claim 98 recites that the user interface of claim 89 is further configured to receive "handwriting recognition input from a user." In addition, dependent claim 98 further recites that the communications facility of claim 89 is "configured to transmit information relating to the handwriting recognition input to the remote computer." Nowhere do either of the applied references teach or suggest a user interface "configured to receive handwriting recognition input from a user." Furthermore, as with the claimed features discussed above, nowhere does the Office Action identify where these references allegedly teach or suggest these features. Therefore, the rejection of dependent claim 98 should be withdrawn for at least this additional reason.

8. The Scan Coin Manual and Sedam Cannot Support a Section 103 Rejection of Independent Claim 99 for at Least the Reason That These References Fail to Teach or Suggest (1) a Redeemable Voucher, and (2) a Communications Facility Configured to Transmit Information From the Coin Counting Apparatus to a Non-Bank Central Computer

Independent claim 99 is directed to a coin counting apparatus that includes, *inter alia*, a user interface configured to receive a request for a redeemable voucher. For the reasons set forth above in regard to claim 46, neither of the applied references teaches or suggests the redeemable voucher of claim 99. Accordingly, the rejection of claim 99 should be withdrawn for at least this reason.

The coin counting apparatus of claim 99 further includes a communication facility configured to transmit information from the coin counting apparatus to a non-bank central computer. As set forth in detail above, the Scan Coin Manual expressly teaches a Coin Deposit System for use in a bank. Nowhere does this reference mention any application for its coin deposit system outside of a banking environment. Therefore, even if one were to accept (and the applicant expressly does not) that the Scan Coin

Coin Deposit System could transmit information to a remote *bank* computer, one could not ignore the explicit requirement of a remote "*non-bank*" computer in claim 99. Therefore, the rejection of claim 99 should be withdrawn for at least the reason that the applied references fail to teach or suggest a communications facility configured to transmit information to a non-bank central computer.

Claim 100 depends from base claim 99. Accordingly, the applied references cannot support a Section 103 rejection of dependent claim 100 for at least the reason that these references cannot support a Section 103 rejection of base claim 99. Therefore, the rejection of claim 100 should be withdrawn.

9. Independent Claims 58 and 69 Are Directed to Methods For Counting Coins That Include, *inter alia*, Receiving a Request For a Redeemable Voucher and Communicating Information to a Central Computer

Independent claims 58 and 69 are directed to methods for counting coins in coin counting machines. The methods include, *inter alia*, receiving a request for a redeemable voucher, and communicating information from the coin counting machine to a central computer. In claim 58, the communicated information is related to a status of a coin receptacle that receives acceptable coins from a coin discriminator. In claim 69, the communicated information is related to a malfunction of at least a portion of the coin counting apparatus.

10. The Scan Coin Manual and Sedam Cannot Support a Section 103 Rejection of Independent Claim 58 For at Least the Reason That These References Fail to Teach or Suggest (1) Receiving a Request For a Redeemable Voucher, and (2) Communicating Information to a Central Computer

Independent claim 58 is directed to a method for counting coins that includes, *inter alia*, receiving a request for a redeemable voucher, and communicating information to a central computer. For the reasons set forth above in regard to claim 46, neither of the applied references teaches nor suggests these features. Therefore, the rejection of claim 58 should be withdrawn for at least this reason.

Claims 59-62 depend from base claim 58. Accordingly, the Scan Coin Manual and Sedam cannot support a Section 103 rejection of dependent claims 59-62 for at least the reason that these references cannot support a Section 103 rejection of base claim 58, and for the additional features of these dependent claims. Therefore, the rejection of dependent claims 59-62 should be withdrawn.

The rejection of dependent claim 61 should be withdrawn for at least one additional reason. The method of claim 61 includes positioning the coin counting machine in a non-bank retail location and dispensing a redeemable voucher. The voucher is redeemable at a point of sale in the non-bank retail location in exchange for products sold in the retail location. Nowhere does the Scan Coin Manual or Sedam teach or suggest the non-bank retail location features of claim 61. To the contrary, the Scan Coin Manual explicitly states that the Coin Deposit System is for use in the lobby of a bank, credit union, savings and loan, or similar institution. Further, nowhere does the Scan Coin Manual or Sedam suggest a voucher that is redeemable at a point of sale in a retail location *in exchange for products sold in the retail location*. Therefore, the rejection of dependent claim 61 should be withdrawn for at least this additional reason.

11. The Scan Coin Manual and Sedam Cannot Support a Section 103 Rejection of Independent Claim 69 for at Least the Reason That These References Fail to Teach or Suggest (1) Receiving a Request for a Redeemable Voucher, and (2) Communicating Information to a Central Computer in the Event of a Malfunction of the Coin Counting Apparatus

Independent claim 69 is directed to a method for counting coins that includes, *inter alia*, receiving a request for a redeemable voucher, and communicating information to a central computer in the event of a malfunction. For the reasons set forth above in regard to the Section 103 rejection of independent claim 63, neither of the applied references teaches nor suggests these features. Therefore, the rejection of claim 69 should be withdrawn.

Claims 70-72 depend from base claim 69. Accordingly, the applied references cannot support a Section 103 rejection of dependent claims 70-72 for at least the reason that these references cannot support a Section 103 rejection of corresponding

base claim 69, and for the additional features of these dependent claims. Therefore, the rejection of dependent claims 70-72 should be withdrawn.

The rejection of dependent claim 71 should be withdrawn for at least one additional reason. Claim 71 is directed to the method of claim 69, and further includes positioning the coin counting machine in a non-bank retail location and dispensing a redeemable voucher. The redeemable voucher is redeemable at a point of sale in the retail location in exchange for products sold in the retail location. Nowhere do the applied references teach or suggest this feature. Accordingly, the rejection of dependent claim 71 should be withdrawn for at least this additional reason.

12. The Scan Coin Manual and Sedam Cannot Support a Section 103 Rejection of Independent Claim 85 for at Least the Reason That These References Fail to Teach or Suggest (1) Means for Receiving a Request for a Redeemable Voucher, and (2) Means for Communicating Information to a Central Computer

Independent claim 85 is directed to a system for counting coins in a coin counting machine. The system includes, *inter alia*, means for receiving a request for a redeemable voucher, and means for communicating information from the coin counting machine to a central computer. In claim 85, the communicated information is related to a status of a coin receptacle in the coin counting machine.

Claim 85 includes features that are at least generally similar to features of independent claim 46 discussed in detail above. Accordingly, the Scan Coin Manual and Sedam cannot support a Section 103 rejection of independent claim 85 for at least the reason that these references cannot support a Section 103 rejection of independent claim 46, and for the additional features of claim 85. Therefore, the rejection of claim 85 should be withdrawn.

Claims 86-88 depend from base claim 85. Accordingly, the applied references cannot support a Section 103 rejection of dependent claims 86-88 for at least the reason that these references cannot support a Section 103 rejection of base claim 85, and for the additional features of these dependent claims. Therefore, the rejection of dependent claims 86-88 should be withdrawn.

B. Response to the Section 103 Rejection of Claims 77-80 and 82-84

Claims 77-80 and 82-84 were rejected under 35 U.S.C. § 103(a) at being unpatentable over the Scan Coin Manual in view of Sedam, and further in view of Kressin.

1. The Scan Coin Manual, Sedam and Kressin Cannot Support a Section 103 Rejection of Independent Claim 77 for at Least the Reason That These References Fail to Teach or Suggest a Communications Facility Configured to Transmit Information Related to an Amount of Coins in a Coin Receptacle

Independent claim 77 is directed to an apparatus for counting coins that includes, *inter alia*, a coin discriminator configured to receive a portion of coins from a vibrating coin feeder, and at least one coin receptacle configured to receive at least a portion of the acceptable coins from the coin discriminator. The apparatus of claim 77 further includes a communications facility configured to transmit information from the coin counting apparatus to a remote computer. In claim 77, the transmitted information is related to the amount of coins in the coin receptacle.

As set forth in detail above in regard to the Section 103 rejection of independent claim 46, neither the Scan Coin reference nor Sedam teaches nor suggests a communications facility configured to transmit information related to an amount of coins in a coin receptacle. Further, Kressin fails to cure this deficiency of the Scan Coin Manual and Sedam. Indeed, the Office Action only relies on Kressin for allegedly teaching a vibrating coin feeder. Therefore, the applied references cannot support a Section 103 rejection of independent claim 77 for at least the reason that these references fail to teach or suggest the claimed communications facility. Therefore, the rejection of independent claim 77 should be withdrawn.

Claims 78-80 depend from base claim 77. Accordingly, the applied references cannot support a Section 103 rejection of dependent claims 78-80 for at least the reason that these references cannot support a Section 103 rejection of corresponding base claim 77, and for the additional features of these dependent claims. Therefore, the rejection of dependent claims 78-80 should be withdrawn.

The rejection of dependent claim 78 should be withdrawn for at least one additional reason. Claim 78 recites that the apparatus of claim 77 further includes a user interface configured to receive a request for a redeemable voucher. For the reasons set forth in detail above in regard to the rejection of independent claim 46, neither the Scan Coin Manual nor Sedam teaches nor suggests this feature. Furthermore, Kressin fails to cure this deficiency of the Scan Coin Manual and Sedam. Therefore, the rejection of dependent claim 78 should be withdrawn for at least this additional reason.

The rejection of dependent claim 80 should be withdrawn for at least one additional reason. Claim 80 recites that the apparatus of base claim 77 further includes a voucher dispenser configured to dispense a voucher that is redeemable at a point of sale in a non-bank retail location in exchange for a product sold at the retail location. Nowhere do any of the applied references teach or suggest this feature. Specifically, nowhere does the Scan Coin Manual even suggest that its Coin Deposit System can be utilized anywhere but a bank, savings and loan, or similar institution. Furthermore, nowhere do any of the applied references teach or suggest exchanging a redeemable voucher for products sold at a retail location. Therefore, the rejection of dependent claim 80 should be withdrawn for at least this additional reason.

2. The Applied References Cannot Support a Section 103 Rejection of Independent Claim 82 for at Least the Reason That These References Fail to Teach or Suggest a User Interface Configured to Receive a Request for a Redeemable Voucher

Independent claim 82 is directed to an apparatus for counting coins that includes, *inter alia*, a user interface configured to receive a request for a redeemable voucher. As set forth in detail above in regard to the Section 103 rejection of independent claim 46, neither the Scan Coin Manual nor Sedam teaches nor suggests this feature. Further, Kressin fails to cure this deficiency of the Scan Coin Manual and Sedam. Therefore, the rejection of independent claim 82 should be withdrawn for at least the reason that the applied references fail to teach or suggest the claimed redeemable voucher.

Claims 83 and 84 depend from base claim 82. Accordingly, the applied references cannot support a Section 103 rejection of dependent claims 83 and 84 for at

least the reason that these references cannot support a Section 103 rejection of corresponding base claim 82, and for the additional features of these dependent claims. Therefore, the rejection of dependent claims 83 and 84 should be withdrawn.

The rejection of dependent claim 84 should be withdrawn for at least one additional reason. Claim 84 recites that the apparatus of claim 82 further includes a voucher dispenser configured to dispense a voucher that is redeemable at a point of sale in a non-bank retail location in exchange for products sold at the retail location. As set forth in detail above, none of the applied references teach or suggest this feature. Accordingly, the rejection of dependent claim 84 should be withdrawn for at least this additional reason.

C. Conclusion

In view of the foregoing, the claims pending in the application comply with 35 U.S.C. § 112 and patentably define over the applied art. Therefore, a Notice of Allowance is respectfully requested. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned attorney at (206) 359-6351.

Respectfully submitted,

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